

To: Seter, David[Seter.David@epa.gov]; Ball, Harold[Ball.Harold@epa.gov]
Cc: Levine, Herb[Levine.Herb@epa.gov]; Jeryl Gardner[JGARDNER@ndep.nv.gov]
From: Jeff R. Collins
Sent: Tue 8/11/2015 9:12:30 PM
Subject: RE: OU-1 thoughts

Guys, I guess the bottom line, after thinking about it over lunch, is whether the EPA would support a smaller group organizing for conceptual FS discussions or do you feel it's necessary to have the RAOs and GRAs fully agreed upon before other discussions can occur? Dave, you're correct...Brian did commit to developing a tech memo for the RAOs and GRAs. Dave, do you have a sense of how long the risk assessment process could take and what other elements of the continuing CERCLA process for OU-1 that could affect? I think if the risk assessment is that much of a burden, maybe you can shift that responsibility over to ARC.

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-----Original Message-----

From: Seter, David [mailto:Seter.David@epa.gov]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Ball, Harold
Cc: Levine, Herb; Jeryl Gardner; Jeff R. Collins; Seter, David
Subject: Re: OU-1 thoughts

One way in which ARC can help ensure the FS process continues forward momentum is for ARC to draft a tech memo proposing initial RAOs and GRAs for OU1. We had a healthy detailed FS scoping discussion at last week's technical stakeholders meeting and also I believe at the July 10 EPA/NDEP/ARC meeting Brian Johnson agreed that ARC would prepare a tech memo on RAOs (I don't recall offhand whether he agreed the tech memo would include both RAOs and GSRs). While ARC is doing that my primary to-do item is to jump-start the risk assessment process which has been stalled due to scheduling difficulties. ARC seems to want EPA to lead/facilitate a lot of scoping discussions in comparison to other sites I've worked on, putting further pressure on EPA resources, shifting the burden to EPA at a very time when ARC is not reimbursing us for our past costs.

From: Ball, Harold
Sent: Tuesday, August 11, 2015 11:14 AM
To: Seter, David
Cc: Levine, Herb; Jeryl Gardner (jgardner@ndep.nv.gov); jrcollins@ndep.nv.gov
Subject: RE: OU-1 thoughts

Dave: Thanks for sharing this exchange. I know the frustration that Jeryl may feel when trying to make progress in big groups but I am mindful of the consideration that short cuts during the FS collaboration can lead to lack of support at decision time that could require backtracking and time lost. It is unfortunate but a reality that the Anaconda site has so many parties that are important stakeholders but so it is. We

may want to include this as an agenda item to discuss at the next manager level meeting as we all seek ways to make the process more efficient. Harry

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-----Original Message-----

From: Seter, David

Sent: Tuesday, August 11, 2015 10:50 AM

To: Jeryl Gardner

Cc: jrcollins@ndep.nv.gov; Ball, Harold; Levine, Herb; Seter, David

Subject: Re: OU-1 thoughts

Jeryl,

I appreciate your efforts to move the project along.

A few things to consider:

EPA specifically needs to consult with Tribes on the selection of Superfund remedies.

BLM and Singatse as property owners/custodians will likely have positions to communicate with respect to the FS.

As major stakeholders, the Tribes, BLM, and Singatse, if not participants in the early phases of FS development have, based on my experience, a greater potential to slow down the later phases of the remedy selection process.

With respect to EPA's consultants, FS components of the project are not currently part of our task orders, nor do we have the financial resources to add those components at this time (as you know ARC has not paid our most recent cost demand).

To the extent we then must rely on internal resources (basically me and Herb Levine) to review FS components those internal reviews will be competing with other workload commitments. That may or may not result in quicker resolution to the FS components.

I'm not copying Jack on this but I am copying Herb and Harry because of workload and tribal consultation implications.

This would also represent a change of philosophy on the site, so I would need to consult Angeles and Harry on that aspect of the proposal.

Thanks,
Dave

From: Jeryl Gardner <JGARDNER@ndep.nv.gov>

Sent: Thursday, August 6, 2015 10:10 AM

To: Seter, David; Jack Oman

Cc: jrcollins@ndep.nv.gov

Subject: OU-1 thoughts

Hi guys,

Good RI meeting and discussions yesterday, but the FS discussions bogged down.

Remembering back to earlier discussions we have had regarding creation of a very small subset TWG to discuss conceptual FS, I think we need to create this group soon, for further discussions. To have the Tribe, and all the consultants that are part of the bigger TWG present participating in these early discussions, is not productive. We would like to hear your thoughts as soon as possible on what you would envision as the Core TWG composition so we can begin more productive discussions.

Thanks,
Jeryl

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